UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PROFESSIONAL FIGHTERS LEAGUE, INC.

Plaintiffs,

v.

TAKEOVER INDUSTRIES, INC. a/k/a NXT LVL,

Defendants.

Case No. 1:24-cv-01335-VEC

NOTICE OF MOTION TO DISMISS PURSUANT TO RULE 12(b)(6)

PLEASE TAKE NOTICE that upon the Declaration of Patrick R. Morris, Esq., dated May 13, 2024, with attached exhibits, and the accompanying Memorandum of Law, Defendant, Takeover Industries, Inc., will move this Court, at a date and time to be determined by this Court, pursuant to Federal Rule of Civil Procedure 12(b)(6) for an order dismissing in full, and with prejudice, Plaintiff's Second Amended Complaint, and for such other relief as this Court deems just and proper.

Dated: May 13, 2024

New York, New York

Yours, etc.,

MORRIS LEGAL CORP.

/s/Patrick Ryan Morris

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